

230697



**Items in Unimatic Notice of Deficiency to Be Discussed With DEP Case Team Prior to
Submission of Remedial Investigation Workplan**

Substantive Discussion Items

1. **Delineation Under Building.** At our January 2005 meeting, DEP suggested we apply for a variance from full delineation requirements under the former Unimatic building, but it is unclear whether such a variance has in fact been granted. As explained previously, it is extremely difficult and costly to take delineation samples through the thick concrete floor of the building. Because: (a) it has been shown that contamination found inside the building is not impacting soil under the building and (b) the entire area under the building will be deed-restricted, there does not appear to be any environmental reason for a delineation exercise under the building. Instead, Unimatic would follow the proposal contained in Section 3.80 of its 2005 Remedial Investigation Workplan ("RIWP") to collect samples west of the building for horizontal delineation purposes (which the Department has previously informally approved). See Figure 2 of the RIWP.

2. **Site-Wide Vertical Delineation.** Because there are several places where PCB contamination extends to significant depths, vertical delineation to the Residential Direct Contact Soil Cleanup Criterion of 0.49 mg/kg would involve at a minimum the installation of over 800 feet of borehole (average depth 25 feet, with some greater than 50 feet deep) and the collection of 60 additional PCB soil samples. Subsequent drilling, sampling, and analysis will probably also be called for the Department at several locations if the first round of samples do not all attain the RDCSCC. This additional useless sampling would cost \$50,000 or more, which are costs that can no longer be borne by this project. Because all of the areas in question are going to be placed under a deed notice anyway, and there cannot possibly be any exposure risk at such depths, installing these boreholes would be no more than an academic exercise that would not benefit the overall environment or human health and safety. If the contemplated remedial method is carried out at the site, many of these deep areas of PCB contamination would be located under permanently-immobile blocks of subsurface concrete.

3. **New Requirement to Investigate for VOCs.** The new requirements for VOC investigations are improper and unreasonable in light of prior work which has been performed. The Preliminary Assessment Report contained a comprehensive inventory of the chemicals Unimatic had historically used at the facility and included numerous Material Safety Data Sheets. Over the course of several subsurface investigations, Unimatic analyzed 24 soil samples for VOCs, **none** of which contained exceedances of **any** targeted VOC. Therefore, there is no need for additional VOC sampling in the soils. Furthermore, not only is there no justification for analyzing all groundwater samples for VOCs, but it is a known fact that the nearby Caldwell Trucking Superfund site contributed VOCs to the groundwater in the vicinity, and any VOC "hits" in the groundwater will in no way demonstrate an impact from Unimatic.

4. **Requirement for Vertical and Horizontal Delineation of Post-Excavation Soil Samples.** In AOCs 5C and 5D, DEP calls for post-excavation soil samples to be delineated vertically and horizontally. The Technical Requirements for Site Remediation contain no such

requirement for post-excavation samples.

5. **Misidentified "Interior Trench."** The "trench" in AOC 7 that is discussed on page 14 of the DEP letter is in fact an internal grating which is only a few inches deep, does not connect to anything, and is far away from the former Unimatic production area. This grating is not part of an AOC, because it is unrelated to any manufacturing process that occurred during Unimatic's operations at the site. Therefore, no further actions are warranted for this grating.

6. **Why Continuous Split-Spoon Sampling is Not Practical.** Because the soils at the site are hard pan, hollow-stem auguring has been unsuccessful in attaining the deeper soil intervals. Rather than continuing split-spoon sampling the entire length of each monitoring well, GZA proposed to attempt to collect continuous split-spoons to 20 feet below ground only in unexplored portions of the site. If a location has already been explored, GZA will drill down to the depth of control before initiating the split-spoon sampling, and would collect one split-spoon every five feet of drilling below a depth of 20 feet or the depth of control, whichever is deeper.

Clarifications Needed

1. **AOC No. 4: Empty Drum Storage Area.** This AOC was approximately 15 ft. by 15 ft., and the two boreholes were installed in the middle to a depth of 4 and 8 feet below grade respectively, which should have been sufficient to encounter a release if there had been one. Consequently, we reiterate our request for an NFI determination.

2. **Regulatory Deficiency for Inappropriate Use of Field Screening Methods.** The DEP's chart of Regulatory Deficiencies on page 2 of its letter cites a deficiency for inappropriate use of field screening methods. Although it is not specified what caused this deficiency, it apparently is listed because the photoionization detector malfunctioned during the installation of a single one of the almost 200 boreholes at the site. A rare equipment malfunction is hardly a regulatory deficiency to be cited in the DEP letter.

3. **Regulatory Deficiencies: Failure to Conduct Soil and Groundwater Remedial Investigations.** Well over \$1.5 million has been spent at the site, hundreds of samples have been taken, and over 95% of the PCBs have been removed from the subsurface. Yet, amazingly the Department claims that it has the basis for including a citation for failure to conduct a remedial investigation of soil. An ongoing groundwater investigation is being conducted, at great expense, yet the letter incorrectly cites a "failure to conduct a RI of groundwater when required."

4. **Applicability of Sheen Policy.** What was described on the well log for MW-4 as an intermittent sheen would in fact not be considered a sheen under the Department's new Sheen Policy dated February 1, 2006. Therefore, there should be no need to perform additional delineation of residual product, as called for in the last paragraph on page 17 of the DEP letter. In addition, it should be noted that the drill cuttings from MW-4 were placed in a 55-gallon drum and disposed of off-site. Therefore, no further action is warranted for this issue.